

ERIC W. SWANIS, ESQ. (NV Bar 6840)
BETHANY L. RABE, ESQ. (NV Bar 11691)
JOEL M. EADS (*Admitted Pro Hac Vice*)
GREENBERG TRAUIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Tel: (702) 792-3773
Fax: (702) 792-9002
Email: swanise@gtlaw.com
rabe@gtlaw.com
joel.eads@gtlaw.com

Counsel for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LING CAI et al.;

Plaintiffs,

v.

ENTERPRISE RENT-A-CAR OF SAN
FRANCISCO, LLC d/b/a "ALAMO," et al.,

Defendants.

NJK

Case No. 2:23-cv-00050-~~ART NJK~~

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO
RESPOND TO THIRD AMENDED
COMPLAINT**

[FIRST REQUEST]

Defendants Enterprise Rent-A-Car OF San Francisco, LLC d/b/a "Alamo," Rental Insurance Services, Inc., ELCO Administrative Services Co. d/b/a "Rental Claims Services" and ACE American Insurance Company (collectively, the "Defendants"), by and through their undersigned counsel, and Plaintiffs Ling Cai, Jing Xu, Z.X. a minor by and through his Natural Parent Jing Xu, and Tammy Harless, as Special Administrator of the Estate of Zhongping Zhou ("Plaintiffs" and collectively with Defendant, the "Parties"), by and through their undersigned counsel, hereby stipulate to extend the deadline for Defendants to file their response to the Third Amended Complaint ("TAC") by one (1) week, until May 10, 2024.

///

///

1 This is the first request to extend the time to respond to the TAC, filed April 19, 2024,
2 Doc. 61. The short extension is necessary to allow Defendants to ascertain certain facts
3 necessary to provide accurate responses to the allegations set forth in the TAC.

4 This stipulation is made in good faith and not for purposes of delay.

5 **IT IS SO STIPULATED.**

6 DATED this 2nd day of May, 2024.

DATED this 2nd day of May, 2024.

7 **THE 702 FIRM**

GREENBERG TRAURIG, LLP

8 /s/Michael Kane

/s/Eric Swanis

9 Bradley J. Meyers, Esq.
Nevada Bar No. 8857
10 Michael C. Kane, Esq.
Nevada Bar No. 10096
11 3753 Howard Hughes Parkway, Suite 200
12 Las Vegas, Nevada 89169

Eric W. Swanis, Esq.
Nevada Bar No. 6840
Bethany L. Rabe, Esq.
Nevada Bar No. 11691
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135

13 *Counsel for Plaintiffs*

Counsel for Defendants

14
15
16 **IT IS SO ORDERED.**

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: May 3, 2024
20
21
22
23
24
25
26
27
28